## 

LAW OFFICES OF

## KAMRAN PARANDIAN

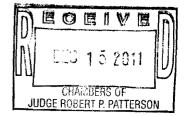
1 Barker Avenue, 4th Floor White Plains ♦ New York ♦ 10601

DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: /2/16/11

TONE: (914) 793-2626 FAX: (914) 239-4678

\*MEMBER OF NY & NJ BARS

December 15, 2011



## VIA FACSIMILE (212) 805-7917

Honorable Robert P. Paterson United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

RE:

Levin v. JPMorgan Chase & Co., et al.

09 Civ. 5900 (RPP)

Dear Judge Patterson:

This office represents Third-Party Defendant Tehran Baspar Plastic ("TBP") in the above referenced action. I write to respectfully request additional time to respond to the third-party complaint (the "Complaint") recently filed by Third-Party Plaintiff Citibank, N.A. ("Citibank") on September 21, 2011.

TBP's response to the Complaint was due on November 17, 2011. TBP received the Summons and Complaint in Iran via DHL on October 26, 2011. The documents were in English which is not the primary language spoken by any person working at TBP. As a result they misread the Summons to mean that they were provided 60 days to respond to the Complaint. TBP respectfully requests a 30-day extension of its time to move, answer or otherwise respond to the Complaint until January 15, 2011. This constitutes TBP's first request for an extension of time. Opposing counsel has been contacted and consents to this application.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: /2/16/11

Respectfully Submitted,

Kamran Parandian

cc: Christopher J. Robinson, Esq. (Counsel for Third-Party Plaintiff Citibank) Sharon L. Schneier, Esq. (Counsel for Third-Party Plaintiff Citibank)